

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

LISA MATARAZZO,

Plaintiff,

v.

EQUIFAX INFORMATION
SERVICES LLC,

Defendant.

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CIVIL ACTION NO.

2:11-cv-05439-JD

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC’S
MOTION TO TRANSFER, OR ALTERNATIVELY,
TO DISMISS FOR FAILURE TO STATE A CLAIM**

Defendant, Equifax Information Services LLC (“EIS”), asks the Court to transfer venue to the United States District Court for the Northern District of Georgia, Atlanta Division. In the alternative, EIS asks that the case be dismissed for failure to state a claim. In support of its motion, EIS shows the Court as follows:

1. Plaintiff, Lisa Matarazzo, is a resident of the State of New Jersey. (See Declaration of Vicki Banks (“Banks Decl.”), attached as Exhibit A, ¶ 18).
2. EIS is a Georgia limited liability company with its principal place of business in Atlanta, Georgia. (Banks Decl. ¶ 7.)

3. To EIS's knowledge, none of the events associated with this lawsuit occurred in Pennsylvania. (*Id.* ¶ 22.)

4. Further, EIS knows of no documents related to this case that were created, received, or are currently maintained in Pennsylvania. (*Id.* ¶ 23.)

5. No representatives of EIS had any material communications with Plaintiff by telephone, U.S. mail, electronic mail, or any other means in Pennsylvania. (*Id.* ¶ 16.) Thus, Pennsylvania has no meaningful connection to this dispute.

6. All party witnesses for EIS reside in or near the Northern District of Georgia. (*See id.* ¶¶ 14, 25.)

7. All of EIS's documents related to the allegations in Plaintiff's Complaint are maintained at EIS's headquarters in Atlanta, Georgia. (*Id.* ¶¶ 13, 24.)

Accordingly, as further discussed in the accompanying Memorandum of Law, EIS respectfully requests that the Court transfer this case, pursuant to 28 U.S.C. § 1404(a), to the United States District Court of the Northern District of Georgia, Atlanta Division, for the convenience of the witnesses and parties and in the interests of justice. In the alternative, EIS asks that the case be dismissed for failure to state a claim.

Respectfully submitted this 31st day of January, 2012.

EQUIFAX INFORMATION SERVICES LLP

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